

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 98
PENSION FUND on behalf of itself and all
others similarly situated,

Plaintiff,

vs.

DELOITTE & TOUCHE, LLP;
DELOITTE LLP,

Defendants.

Case No. 3:19-cv-3304

CLASS ACTION

**DEFENDANTS' NOTICE OF COMPLIANCE AND
CERTIFICATION OF DISCLOSURE**

Defendants Deloitte & Touche LLP ("D&T") and Deloitte LLP (collectively, "Deloitte" or "Defendants"), by and through undersigned counsel, and in accordance with the Fifth Amended Consent Scheduling Order, ECF No. 229, gives notice that it has identified the persons whom it expects to call as experts at trial to offer affirmative testimony, and certifies that this notice has been served upon counsel for the Lead Plaintiff on September 13, 2024. Defendants reserve the right to disclose any additional experts as permitted by the Federal Rules of Civil Procedure, including for purposes of rebuttal and in response to Lead Plaintiff's affirmative expert reports to be served on September 27, 2024.

The following individual has been retained or specially employed by Defendants to provide affirmative expert testimony on the topics below:

1. **Paul J. Hibbard**
Analysis Group
c/o Jed. M. Schwartz
Milbank LLP
55 Hudson Yards
New York, New York 10001-2163
(212) 530-5000

Topics: Regulatory framework (including the roles of the various parties involved);
prudence reviews

Defendants reserve the right to call any expert witness identified or called by Lead Plaintiff.

Dated: September 13, 2024

Respectfully submitted,

/s/Daniel R. Fuerst

Christopher A. Ogiba, Fed. ID No. 9042

Lesley A. Firestone, Fed. ID No. 11719

Tiffany Payne, Fed. ID No. 13772

Daniel R. Fuerst, Fed. ID No. 12616

Lauren N. Vriesinga, Fed. ID No. 12188

Moore & Van Allen, PLLC

78 Wentworth Street

Charleston, South Carolina 29401

Telephone: 843-579-7066

Facsimile: 843-579-8749

Email: chrisogiba@mvalaw.com

lesleyfirestone@mvalaw.com

tiffanypayne@mvalaw.com

danielfuerst@mvalaw.com

laurenvriesinga@mvalaw.com

Mark A. Nebrig

John A. Fagg, Jr.

Nader Raja

Moore & Van Allen, PLLC

100 North Tyron Street Suite 4700

Charlotte, North Carolina 28202-4003

Telephone: 704-331-3602

Facsimile: 704-339-5974

Email: marknebrig@mvalaw.com

johnfagg@mvalaw.com

naderraja@mvalaw.com

Scott A. Edelman

Atara Miller

Jed M. Schwartz

Andrew B. Lichtenberg

Katrin A. Cassidy-Ginsberg

Milbank LLP

55 Hudson Yards

New York, New York 10001-2163

Telephone: 212-530-5000

Facsimile: 212-530-5219

Email: sedelman@milbank.com

amiller@milbank.com

jschwartz@milbank.com

alichtenberg@milbank.com

kcassidy-ginsberg@milbank.com

*Lead Counsel for Defendants Deloitte
& Touche LLP and Deloitte LLP*